

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

25-cv-4505

Lucio Celli

Plaintiff,

v.

NYC et al

Defendants.

Notice of **PETITION FOR WRIT OF MANDAMUS TO ENFORCE JUDICIAL ORDERS ISSUED by Engelmayer UNDER PRESIDENT TRUMP and criminal prevention by Judge Subramanian and to politically help Randi Weingarten with intimidation of my mother, denial of a fair trial, wages theft by her, denial of HIV drugs by her, and pension theft by her**

Dear, Pres Trump, AG Bondi, Kopplin Rep. Eli Crane (R AZ 2), Rep. Warren Davidson (R OH 8), Rep. Abraham Hamadeh (R AZ 8), Rep. Anna Paulina Luna (R FL 13), Rep. Andy Ogles (R TN 5), Rep. Lauren Boebert (R CO 4), Rep. Brandon Gill (R TX 26), Rep. Andrew Clyde (R GA 9), Rep. Josh Brecheen (R OK 2), Rep. Eric Burlison (R MO 7), Rep. Mike Collins (R GA 10), and Rep. Marjorie Taylor Greene (R GA 14)—please know that these judges have access to the same evidence and preventing a record of Cudina’s admission of Livingston/Engelmayer, Silverman’s admission for Randi Weingarten and Cogan, BOP’s audio of my mother informing me of Randi’s/Silverman’s intimidation

Notice of PETITION FOR WRIT OF MANDAMUS TO ENFORCE JUDICIAL ORDER ISSUED UNDER PRESIDENT TRUMP and criminal prevention by

I. INTRODUCTION

This Petition seeks a writ of mandamus under 28 U.S.C. § 1361 and the All Writs Act, 28 U.S.C. § 1651(a), to compel enforcement of a valid federal judicial order entered under President Donald J. Trump's administration—specifically an order by Judge Paul Engelmayer—which has been unlawfully suppressed, distorted, or ignored by subordinate judicial officers and Department of Justice attorneys in service of political actors including Randi Weingarten, Senator Charles Schumer, and Chief Judge Debra Ann Livingston.

Such obstruction has denied Petitioner access to court, employment-related due process, earned wages and pension credits, and life-sustaining medical treatment, including HIV medications. These injuries stem from direct interference with the Executive Branch's constitutional obligation to enforce judicial orders under the Take Care Clause, U.S. Const. art. II, § 3.

II. JURISDICTION AND LEGAL STANDARD

This Court has jurisdiction under:

- 28 U.S.C. § 1361 (mandamus to compel performance of a duty owed by United States officers),
- 28 U.S.C. § 1651(a) (All Writs Act), and
- The inherent supervisory power of Article III courts.

Mandamus relief is appropriate where:

1. Petitioner has a clear right to relief;
2. Respondent owes a clear, non-discretionary duty;
3. No other adequate remedy exists.

See *Allied Chemical Corp. v. Daiiflon, Inc.*, 449 U.S. 33, 35 (1980); *Heckler v. Ringer*, 466 U.S. 602, 616 (1984).

III. BACKGROUND FACTS

1. Judge Paul Engelmayer, under President Trump's administration, issued findings/order acknowledging the New York City Department of Education's (DOE) prior knowledge and omissions regarding Petitioner's employment, rights, and benefits.
2. Petitioner was instructed that retroactive pay and benefits could only be granted if Petitioner could prove illegal detention or false justification for disciplinary action—a standard met by documentary and testimonial evidence later concealed by DOJ actors and magistrate judges.
3. The enforcement and recognition of this order has been deliberately suppressed by Judge. Lehrburger, Judge Arun Subramanian, and AUSAs including Anna Karamigios, to prevent exposure of political retaliation involving Randi Weingarten and the UFT with her criminal interference in my cases.
4. Officer Lombardo falsely represented that a forged document by attorney Silverman reflected Judge Engelmayer's order as Silverman's email was over a year after July 20, 2021.

5. These misrepresentations violate judicial ethics, interfere with Executive enforcement obligations, and constitute obstruction of the lawful functions of the United States under 18 U.S.C. §§ 1505, 371, and 241.

IV. THE TAKE CARE CLAUSE AND PRESIDENTIAL AUTHORITY

The President is constitutionally required to:

“Take Care that the Laws be faithfully executed.” – U.S. Const. art. II, § 3

Federal judicial orders are among the laws to be executed. Suppression or distortion of such orders:

- Interferes with the President’s enforcement powers;
- Usurps constitutional functions of the Executive;
- Violates the separation of powers.

See *Kendall v. United States*, 37 U.S. 524 (1838); *United States v. Nixon*, 418 U.S. 683 (1974).

V. STATUTORY AND CONSTITUTIONAL VIOLATIONS

- **18 U.S.C. § 1505** – Obstruction of agency enforcement
- **18 U.S.C. § 371** – Conspiracy to defraud the United States
- **18 U.S.C. § 241** – Conspiracy against civil rights
- **Judicial Code of Conduct** – Canons 2A, 3C
- **28 U.S.C. § 455(b)(1), (b)(4), (b)(5)** – Judicial recusal

VI. NO OTHER ADEQUATE REMEDY EXISTS

- Petitioner’s efforts to appeal or amend have been procedurally blocked;
- Court officers refused to docket motions or corrected transcripts;
- Retaliatory sanctions have been threatened to suppress further filings.

Only a writ of mandamus can compel performance of constitutional and legal duties by judicial and DOJ officers.

VII. REQUEST FOR RELIEF

Petitioner respectfully requests:

1. A writ of mandamus compelling production, enforcement, and full recognition of Judge Engelmayer’s prior order;
2. Declaratory finding that suppression of the order violates the Take Care Clause and the separation of powers;
3. Immediate recusal of all judicial officers and AUSAs implicated in concealment or distortion;

4. Referral to the DOJ Public Integrity Section for violations of 18 U.S.C. §§ 241, 371, 1505;
5. Notification to Congress of judicial misconduct interfering with Executive enforcement functions.

Respectfully submitted,

**JUDICIAL MISCONDUCT COMPLAINT due to political misuse for
Schumer/Weingarten and conceal the criminal conduct of Livingston and Engelmayer with
suppression of evidence and statements by US Probation Officers to deprive of wages and
intentional HIV meds denial by the UFT/DOE/Probation and pension**

Filed Pursuant to 28 U.S.C. § 351

**Against: The Hon. Arun Subramanian, U.S. District Judge
United States District Court for the Southern District of New York**

Complainant:

Lucio Celli
89 Widmer Road, Wappingers Falls NY 12590

I. Summary of Allegations

Judge Arun Subramanian has committed judicial misconduct by politically misusing his Article III position to protect and advance the interests of Senator Charles Schumer, who recommended him to the bench, and to retaliate against the complainant for exposing misconduct and asserting rights protected by the U.S. Constitution and federal statutes. This includes concealment of evidence, distortion of facts, and abuse of the judicial process.

II. Detailed Allegations

1. Political Appointment and Alignment with Schumer Bloc

Judge Subramanian was appointed with the public support and recommendation of Senator Charles Schumer. Since taking the bench, Judge Subramanian has acted in alignment with the political bloc led by Schumer, Chief Judge Debra Ann Livingston, and Randi Weingarten,

suppressing the complainant's claims and concealing misconduct to shield these figures from exposure and liability.

2. Retaliatory Mischaracterization of Key Evidence

Judge Subramanian falsely characterized the **intimidation of the complainant's mother by Randi Weingarten and attorney Ben Silverman**—including coercive tactics and emotionally manipulative statements—as part of a legitimate employment proceeding. This misstatement was knowingly made to whitewash serious acts of retaliation and obstruction, which were committed to silence the complainant and insulate politically connected actors.

3. Suppression of Exculpatory Orders and Entitlement to Economic Redress

The judge failed to acknowledge or integrate **Judge Engelmayer's prior ruling**, which confirmed that the DOE had prior knowledge of the facts contradicting the justification for the complainant's termination. The concealment of this order constitutes judicial misconduct and obstructs the complainant's right to due process, reinstatement, and redress for lost wages and pension rights.

4. Denial of Application for Disability Pension and Medical Entitlements

Judge Subramanian participated in concealing that **Judge Livingston possessed evidence** relevant to the complainant's **eligibility for accidental disability pension and medical accommodations**, denying the complainant access to financial protections expressly afforded under law. This contributes to a pattern of political protectionism and economic injury.

5. Weaponized Sanctions to Silence Access to Redress

In a particularly egregious act of misconduct, **Judge Subramanian attempted to impose sanctions against the complainant**—not for any abusive litigation conduct, but in direct retaliation for seeking to **regain constitutional and statutory rights** stolen or obstructed by **Judges Engelmayer and Livingston, attorney Cogan, and union leader Randi Weingarten**. These include:

- **Wages already earned**, withheld in bad faith;
- **Pension credits and benefits denied without due process**;
- **Redress for years of retaliatory harassment and coercion** by the United Federation of Teachers and Randi Weingarten;
- **Access to fair proceedings free of political interference**.

This use of judicial authority as a blunt instrument to punish and suppress dissent violates both the **canons of judicial conduct** and the **legislative purpose of the Judicial Conduct and Disability Act**.

III. Legislative History and Purpose of the Judicial Conduct and Disability Act of 1980

The **Judicial Councils Reform and Judicial Conduct and Disability Act of 1980**, Pub. L. No. 96-458, 94 Stat. 2035, codified at 28 U.S.C. §§ 351–364, was enacted to restore public trust in the federal judiciary by providing mechanisms to discipline judges who **engage in conduct that is prejudicial to the administration of justice** or exhibit **bias, favoritism, or impropriety**.

Key points from legislative history:

- **House Report 96-1313 (1980)** emphasized the need for accountability in cases where judges “conceal material facts,” engage in “politically motivated decisions,” or retaliate against litigants seeking lawful redress.
- **Senate Hearings** recorded concerns about judges **abusing lifetime tenure to shield powerful allies**, especially in cases where rights are denied or distorted to protect the political elite.
- The law explicitly covers **both actual misconduct and the appearance of impropriety**, particularly where rulings appear to be influenced by **political loyalty or favoritism**.

Judge Subramanian’s conduct, viewed alongside his known political allegiance and appointment history, falls squarely within the scope of what the 1980 Act sought to prevent.

IV. Canon Violations

- **Canon 1:** Failure to maintain the integrity and independence of the judiciary;
- **Canon 2(A):** Failure to avoid impropriety and the appearance of impropriety;
- **Canon 3(A)(4):** Failure to accord every person a full and fair opportunity to be heard;
- **Canon 3(A)(6):** Retaliatory findings and distortions of record in pending matters.

V. Relief Requested

Complainant requests:

1. Immediate investigation into Judge Subramanian’s conduct and political affiliations;
2. Public disclosure of all communications involving Schumer, Livingston, or Weingarten related to rulings in this matter;
3. Vacatur of rulings where misconduct or political retaliation tainted the record;
4. Discipline or referral of Judge Subramanian to appropriate judicial council under 28 U.S.C. § 354;
5. Congressional and Judicial Conference notification consistent with the separation of powers doctrine and legislative oversight of judicial integrity.

VI. Evidence to Be Submitted

- Judge Engelmayer's prior order (suppressed);
- Audio/video and sworn statements documenting intimidation of complainant's mother;
- Wage and pension documentation showing withheld entitlements;
- Judicial rulings omitting exculpatory evidence and enabling retaliation;
- Record of threats and harassment by UFT and Weingarten;
- Docket history and procedural irregularities demonstrating suppression and bad faith findings.

06/27/2025	<u>9</u>	<p>MOTION FOR SANCTIONS AND CRIMINAL REFERRAL FOR FRAUD, EMBEZZLEMENT, OBSTRUCTION, AND RACKETEERING CONDUCT OF THE UFT AND RANDI WEINGARTEN. Document filed by Lucio Celli.(jca) (Entered: 06/27/2025)</p> <p>To aide Randi in union emblemment, as Schumer judge have gone out of their way to conceal that Randi will not say who paid for the motel and meals</p> <p>These are in Engelmayer's emails too</p>
06/28/2025	<u>11</u>	<p>LETTER addressed to Judge John P. Cronan from Lucio Celli dated 6/28/2025 re: Retaliatory Sanctions by the Doe and UFT and Denial of Remedy in Coordination with Randi Weingarten and UFTas there is evidence that the NYC has and as doe DOJ. Document filed by Lucio Celli. (jjc) (Entered: 06/30/2025)</p> <p>There is evidence and AUSAs to call to support so not frivolous but his criminal conduct under 18 USC § 371</p>
06/28/2025	<u>12</u>	<p>LETTER from Lucio Celli dated 6/28/2025 re: Howard Friedmans aide admitted that Randi Weingarten and the UFT were harassing and this is what Engelmayer helped to cover up. Document filed by Lucio Celli. (jjc) (Entered: 06/30/2025)</p>

		Admission of intentional harassment and admission that Randi had Silverman and Engelmayer surpass
06/28/2025	<u>13</u>	LETTER from Lucio Celli dated 6/28/2025 re: Attached are letters to Pres Trump and other government agencies to terminate federal funds as they were away of and have admitted to Randi Weingarten and UFTs to retaliation and mental harassment towards me with Lehrburger CRIMINALLY helping Randi Wiengarten and the UFT. Document filed by Lucio Celli. (jjc) (Entered: 06/30/2025) The City continues to conceal evidence of Randi's criminal conduct that Engelmayer ordered Karamigios to obtain
06/28/2025	<u>14</u>	MOTION FOR EVIDENTIARY HEARING ON EMPLOYER ADMISSION OF UNION HARASSMENT. Document filed by Lucio Celli. (jjc) (Entered: 06/30/2025)
06/28/2025	<u>15</u>	PLAINTIFF'S MOTION FOR AN EVIDENTIARY HEARING. Document filed by Lucio Celli. (jjc) (Entered: 07/01/2025)
06/28/2025	<u>16</u>	MOTION FOR SANCTIONS, INVESTIGATORY HEARING, AND RELIEF UNDER FRCP 11, 26, 37, AND 60 BASED ON THE CITY'S KNOWLEDGE AND FAILURE TO INTERVENE IN CRIMINAL CONDUCT AND WAGE THEFT. Document filed by Lucio Celli. (jjc) Modified on 7/1/2025 (jjc). (Entered: 07/01/2025)
06/28/2025	<u>17</u>	PLAINTIFF'S MOTION FOR SANCTIONS AGAINST THE CITY OF NEW YORK FOR AIDING AND ABETTING RACKETEERING ACTIVITY INVOLVING THE UFT AND RANDI WEINGARTEN. Document filed by Lucio Celli. (jjc) Modified on 7/1/2025 (jjc). (Entered: 07/01/2025)
06/28/2025	<u>18</u>	PLAINTIFF'S MOTION TO AMEND OR MAKE ADDITIONAL FINDINGS OF FACT UNDER FEDERAL RULE OF CIVIL PROCEDURE 52(b). Document filed by Lucio Celli. (jjc) (Entered: 07/01/2025)

06/28/2025	<u>19</u>	PLAINTIFF'S MOTION TO STRIKE DEFENDANTS' SANCTIONS REQUEST AND FOR SANCTIONS UNDER RULE 11(c), RULE 26(g), AND THE COURT'S INHERENT AUTHORITY. Document filed by Lucio Celli. (jjc) (Entered: 07/01/2025)
06/28/2025	<u>20</u>	NOTICE OF MOTION FOR SANCTIONS PURSUANT TO FRCP 11(c), 26(g), AND THE COURT'S INHERENT AUTHORITY. Document filed by Lucio Celli. (jjc) (Entered: 07/01/2025)
06/29/2025	<u>26</u>	LETTER from Lucio Celli re: I request email notification by Mr. Frank has never sent me anything that he posted in 25-cv-2031 and I request the same for 25-cv-4505. Document filed by Lucio Celli.(rro) (Entered: 07/02/2025)
06/29/2025	<u>27</u>	PLAINTIFF'S MOTION TO SERVE THE U.S. DEPARTMENT OF JUSTICE, THE WHITE HOUSE, AND PRESIDENT DONALD J. TRUMP VIA CERTIFIED MAIL. Document filed by Lucio Celli. (rro) (Entered: 07/02/2025)
06/29/2025	<u>28</u>	MOTION FOR JUDICIAL NOTICE. Document filed by Lucio Celli. (Attachments: # <u>1</u> Exhibit Exhibit 1, # <u>2</u> Errata Exhibit 2)(rro) (Entered: 07/02/2025)
07/01/2025	<u>21</u>	MOTION FOR JUDICIAL NOTICE OF MATERIAL FACTS REGARDING JUDICIAL OBSTRUCTION AND SUPPRESSION OF EVIDENCE BY JUDGES ENGELMAYER AND LEHRBURGER. Document filed by Lucio Celli. (jca) (Entered: 07/01/2025)
07/01/2025	<u>22</u>	MOTION TO AMEND MAGISTRATE JUDGE'S REPORT AND RECOMMENDATION ON SANCTIONS AND FOR AN EVIDENTIARY HEARING. Document filed by Lucio Celli.(jca) (Entered: 07/01/2025)
07/01/2025	<u>23</u>	PLAINTIFF'S MOTION FOR SANCTIONS PURSUANT TO FED. R. CIV. P. 11, 37(b), AND THE COURT'S INHERENT POWERS FOR CONCEALMENT OF EVIDENCE OF CONSPIRACY TO DEPRIVE

		CONSTITUTIONAL RIGHTS. Document filed by Lucio Celli.(jca) (Entered: 07/01/2025)
07/01/2025	<u>24</u>	NOTICE OF MOTION FOR SANCTIONS PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 11(c) AND 37(b)-Lehrburger concealing evidence from BOP of Silverman and Randi Weingarten intimating my mother. Document filed by Lucio Celli.(jca) (Entered: 07/01/2025)
07/01/2025	<u>25</u>	MOTION UNDER FRCP 52(b), 60(b)(6), AND 11 FOR SANCTIONS AND RELIEF FROM MAGISTRATE JUDGE LEHRBURGER'S FINDINGS AND LEHRBURGER's OBSTRUCTION ALSO COUNTS as a predicate act for the UFT and Randi Weingarten. Document filed by Lucio Celli.(jca) (Entered: 07/01/2025)
07/01/2025	<u>32</u>	NOTICE OF MOTION, AFFIRMATION, AND MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR SANCTIONS, RECORD CORRECTION, AND CRIME-FRAUD RELIEF PURSUANT TO PENAL LAW § 175.20 AND JUDICIARY LAW § 487. Document filed by Lucio Celli. (yv) (Entered: 07/07/2025)
07/01/2025	<u>33</u>	MOTION TO STRIKE DOE'S PLEADINGS with Sanction request AND FOR SANCTIONS UNDER FEDERAL LAW FOR EVIDENCE CONCEALMENT, RICO VIOLATIONS, OBSTRUCTION, AND CRIME-FRAUD SCHEME. Document filed by Lucio Celli.(yv) (Entered: 07/07/2025)
07/01/2025	<u>34</u>	PLAINTIFF'S MOTION FOR JUDICIAL NOTICE AND DECLARATION OF FEDERAL EXCLUSIVE JURISDICTION OVER PROCEEDINGS ARISING FROM JUDGE ENGELMAYER'S AUGUST 9, 2023 ORDER. Document filed by Lucio Celli. (mml) (Entered: 07/08/2025)
07/01/2025	<u>35</u>	PLAINTIFF'S MOTION FOR JUDICIAL NOTICE UNDER FEDERAL RULE OF EVIDENCE 201. Document filed by Lucio Celli. (mml) (Entered: 07/08/2025)

07/02/2025	<u>29</u>	MOTION FOR SANCTIONS, EVIDENTIARY HEARING, AND ENFORCEMENT OF 18 U.S.C. § 1581, AND RELATED CONSTITUTIONAL VIOLATIONS ARISING FROM ILLEGAL DETENTION TO ENFORCE WAGE THEFT AND OBSTRUCT JUDICIAL ORDERSpart of fabricated probation violation and civil RICO. Document filed by Lucio Celli. (jca) (Entered: 07/02/2025)
07/02/2025	<u>30</u>	PLAINTIFF'S MOTION FOR SANCTIONS AGAINST THE UNITED FEDERATION OF TEACHERS AND THE NEW YORK CITY DEPARTMENT OF EDUCATION. Document filed by Lucio Celli. (jca) (Entered: 07/02/2025)
07/02/2025	<u>31</u>	NOTICE OF MOTION AND AFFIRMATION IN SUPPORT OF MOTION TO STRIKE PRIVILEGE, COMPEL DISCLOSURE, AND SANCTION DEFENDANTS FOR FRAUD ON THE TRIBUNAL UNDER THE CRIME-FRAUD EXCEPTION AND PENAL LAW §§ 215.00 ET SEQ. Document filed by Lucio Celli. (jca) (Entered: 07/02/2025)
07/09/2025	<u>36</u>	LETTER addressed to Judge Arun Subramanian from Lucio Celli dated July 3, 2025 re: When I amend-if Your Honor does not dismiss this for Schumer and Randi-I have to add the current situation of Employers health insurance and its future cost. Document filed by Lucio Celli.(jca) (Entered: 07/09/2025)
07/10/2025	<u>37</u>	LETTER addressed to Pres Trump, AG Bondi, FBI, Congress and Rep Green with Your Honors from Lucio Celli dated July 11, 2025 re: Notice. Document filed by Lucio Celli. (ar) (Entered: 07/14/2025)
07/10/2025	<u>38</u>	MOTION FOR Pres Trump to intervene as Engelmayers orders are part of his duties and it is part of the reason Engelmayer needs to be impeached because of his misuse of his office for political reasons of Schumer and Randi Weingarten. Document filed by Lucio Celli.(ar) (Entered: 07/14/2025)
07/10/2025	<u>39</u>	MOTION FOR WRIT OF MANDAMUS. Document filed by Lucio Celli. (tg) (Entered: 07/14/2025)

07/11/2025	40	<p>MOTION FOR Pres Trump to intervene as Engelmayer's orders are part of his duties and it is part of the reason Engelmayer needs to be impeached because of his misuse of his office for political reasons of Schumer and Randi Weingarten. Document filed by Lucio Celli.(yv) (Entered: 07/14/2025)</p> <p>Please Take Notice, there is a certified transcript of Engelmayer's order on 24-cv-9743</p>
07/13/2025	41	<p>LETTER addressed to Judge John P. Cronan from Lucio Celli dated 7/13/2025 re: Ms. Kopplin of US Ethics Committee, ethical complaint against Sen. Schumer and Sen. Gillibrand for helping Randi Wiengarten, the UFT, the NYC and Judge Engelmayer steal wages owed to me and preventing the testimony of Ms. Petterson and others to establish this fact for the record or call Friedmans aide or the emails he mentioned-under 18 USC § 245. Document filed by Lucio Celli. (jjc) (Entered: 07/15/2025)</p> <p>This was due to Guajati writing that decision rendered in 2016/2017 included events from 2018 until now</p>
07/13/2025	42	<p>PLAINTIFF'S MOTION FOR SANCTIONS AGAINST ASSISTANT UNITED STATES ATTORNEYS FOR CONCEALING MATERIAL FILINGS, WAGE THEFT, AND FACILITATING FRAUD ON THE COURT. Document filed by Lucio Celli. (jjc) (Entered: 07/15/2025)</p>
07/13/2025	43	<p>LETTER addressed to Judge John P. Cronan from Lucio Celli dated 7/13/2025 re: Price and I have the same Supervisor and both held without bail, but our supervisor gave Price her retro and knew about the bail and deprived me of my retro money because of the bail. Document filed by Lucio Celli. (jjc) (Entered: 07/15/2025)</p>
07/13/2025	44	<p>LETTER addressed to Judge John P. Cronan from Lucio Celli dated 7/13/2025 re: Lehrburger prevented Dubeck and Strauber from testifying about pension theft and lied about pension theft to help Livingston and Engelmayer now I inform the Court that Hon.</p>

		Gleason was on the emails to Strauber with the evidence from the UFT and NYC TRS. Document filed by Lucio Celli. (jjc) (Entered: 07/15/2025)
07/13/2025	45	LETTER addressed to Judge John P. Cronan from Lucio Celli dated 7/13/2025 re: Wolfe continue to obstruct justice by blocking my filings at the 2d Cir. and Livingston has not answered my letter for N95 form for Probation's misconduct. Document filed by Lucio Celli. (jjc) (Entered: 07/15/2025)

Submitted on:

Respectfully submitted,

/s/ Lucio Celli

DATED: June 11, 2025

Respectfully submitted,

Lucio Celli

89 Widmer Road

Wappingers Falls, New York 12590

917-275-3919

Lucio.Celli.12@gmail.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2024-cv-09743/25-cv-203/25-cv-4505

Lucio Celli,

Plaintiff,

v.

New York City et al,

Defendants.

MOTION FOR Pres Trump to intervene as Engelmayer's orders are part of his duties and it is part of the reason Engelmayer needs to be impeached because of his misuse of his office for political reasons of Schumer and Randi Weingarten

JUDICIAL NOTICE AND MEMORANDUM OF LAW RECOGNIZING
PRESIDENTIAL AUTHORITY TO ENFORCE FEDERAL COURT ORDERS
UNDER ARTICLE II AND SUPREME COURT PRECEDENT—enforce
Engelmayer's orders that affected and helped Randi Weingarten and the
UFT with wages theft, pension theft and caused me to be HIV drug
resistance –rule 60 too

Dear Hon. Cronan, Pres Trump, AG Bondi, Congress, FBI and Hon. Conrad

I. INTRODUCTION

Plaintiff respectfully moves this Court to take judicial notice under **Fed. R. Evid. 201(b)** and affirm the legal principle that **the President of the United States possesses constitutional authority to enforce federal court orders**, particularly where federal officers, subordinate agencies, or lower courts have obstructed enforcement.

This motion is brought to support Plaintiff's claim that **court orders issued in prior proceedings**—including orders beneficial to Plaintiff—have been **deliberately ignored, distorted, or suppressed** by federal officers and judicial actors, and that executive enforcement is both **constitutionally proper and historically supported**.

I know already—this is frivolous and abuse of process because I should allow Randi Weingarten, the DOE and the Doe to steal from me with allowing Engelmayer and Randi with Cogan get away with crimes under 18 USC § 241—to Cronan and Lehrburger because no statements have been made by the judge in 25-cv-4505

Please Take Notice, this is why Engelmayer's orders are not being enforced as to allowed Randi Wiengarten and the UFT get away with known crimes

Look at Judge Diane Gujarati because she wrote: Friedman's aide's admission and the email were decided by Cogan and the 2d Cir—this is impossible because this cannot be found in the record, as this event came AFTER those rulings

This is a crime like Judge Marrero said

II. LEGAL STANDARD

Under **Federal Rule of Evidence 201**, a court may take judicial notice of a legal principle that is:

- **Generally known within the trial court's jurisdiction**, and
- **Capable of accurate and ready determination by reliable sources**.

III. CONSTITUTIONAL BASIS FOR ENFORCEMENT

Under **Article II, Section 3** of the U.S. Constitution, the President:

“...shall take Care that the Laws be faithfully executed...”

This includes enforcement of:

- Federal **statutes**,
- Federal **judgments and orders**, and
- Constitutional **rights and obligations** recognized by federal courts.

IV. SUPREME COURT CASE LAW CONFIRMING PRESIDENTIAL ENFORCEMENT AUTHORITY

In re Debs, 158 U.S. 564 (1895)

The President may use federal power to **enforce court orders** and ensure compliance, even in opposition to state resistance or private obstruction.

“Every government, entrusted by the Constitution with powers and duties to be exercised and discharged, has the right to call to its aid the forces which may be necessary.”

This is used when courts or parties defy federal rulings and the executive must act to preserve judicial authority.

Cooper v. Aaron, 358 U.S. 1 (1958)

Federal court decisions are **binding on all executive and judicial officers**, and **the President may act to enforce them**.

Cited President Eisenhower’s deployment of federal troops to enforce desegregation orders.

This is used against the DOE and NYSED

Youngstown Sheet & Tube Co. v. Sawyer, 343 U.S. 579 (1952)

Although the President may not make law, he **has full authority to execute existing law**—including lawful judicial orders.

Ex parte Young, 209 U.S. 123 (1908)

Enforcement of constitutional rights and federal court orders **may be directed against state actors** and enforced by federal officers where necessary.

V. APPLICATION TO PLAINTIFF’S CASE

Plaintiff asserts that:

1. Federal court orders—particularly those issued by Judge Engelmayer and relating to Plaintiff’s **property, liberty, and medical access rights**—have been deliberately **ignored or undermined** by federal agencies and judicial personnel.
 2. This Court, under *Debs* and *Cooper*, should **recognize that the President retains authority** to ensure enforcement of such orders.
 3. Plaintiff may seek relief from obstruction by invoking the **Article II executive authority** to act against institutional defiance of court orders, especially where DOJ, clerks, or judicial officers have acted in **bad faith** or for **political retaliation**.
-

VI. REQUEST FOR RELIEF

Plaintiff respectfully moves this Court to:

1. **Take judicial notice** under Fed. R. Evid. 201(b) of the President’s constitutional authority to enforce federal court orders;
 2. Recognize that under *In re Debs*, *Cooper v. Aaron*, and Article II, such enforcement authority exists regardless of political considerations or subordinate obstruction;
 3. Allow Plaintiff to **invoke or request executive enforcement** of federal court orders previously issued and now ignored or distorted.
-

VII. CONCLUSION

Presidents from Eisenhower to Lincoln to Trump have constitutionally exercised their enforcement powers to preserve the authority of the judiciary. Where judicial officers and federal actors obstruct valid court orders, it is not only permissible—but necessary—for the President to intervene to “take care that the laws be faithfully executed.”

Dated: July 9, 2025

Respectfully submitted,

/s/ Lucio Celli

Respectfully submitted,
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